

Data Protection Policy

Purpose

This Data Protection Policy describes the categories of personal data 2nd Acomb (St. Stephen's) Scout Group process and for what purposes. 2nd Acomb (St. Stephen's) Scout Group are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

Applies to

All adult members of 2nd Acomb (St. Stephen's) Scout Group, parents/guardians of members, Young Leaders, suppliers, contractors and members of the public who make contact with the Group.

Summary

2nd Acomb (St. Stephen's) Scout Group is committed to protecting the personal data it controls. We collect and use information only where necessary to run Scouting safely and effectively, comply with our legal obligations, and support the delivery of our programmes and activities. We follow the requirements of the UK GDPR and Data Protection Act 2018, ensuring that data is processed fairly, stored securely, shared only where appropriate, and retained only for as long as needed. This policy explains what data we process, why we process it, how long we keep it, how it is stored, when it may be shared, who with, and the rights individuals have in relation to their personal information.

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Version control

Version	Author	Role	Release date
1.0	Becky Lincoln	Group Scout Leader	01 March 2022
2.0	Becky Lincoln	Group Scout Lead Volunteer	01 March 2023
3.0	Becky Lincoln	Group Scout Lead Volunteer	01 June 2023
4.0	Russell Odom	Deputy Chair	10 Feb 2026

The data we may process

The majority of the personal information we hold is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership systems. The data protection policy and security notice for our youth membership system can be found at www.onlinescoutmanager.co.uk/privacy.html. In the case of adult members and volunteers, data may also be provided by third parties, such as the Disclosure and Barring Service (DBS).

Where a member is under the age of 18, this information will only be obtained from a parent or guardian and cannot be provided by the young person.

We may collect the following personal information:

- Personal contact details such as name, title, address, telephone numbers and personal email address: so that we can contact you
- Date of birth: so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on an appointment with Scouting.
- Gender: so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information: so that we are able to contact someone in the event of an emergency.

- Government identification numbers e.g. national insurance, driving licence, passport: to be able to process volunteer criminal record checks.
- Tax status information: so that we are able to collect gift aid from HMRC where donations are made.
- Training records: so that members can track their progression through the Scout programme or adult training scheme.
- Race or ethnic origin: so that we can make suitable arrangements based on members cultural needs.
- Health records: so that we can make suitable arrangements based on members medical needs.
- Criminal records checks: to ensure Scouting is a safe space for young people and adults.

The lawful basis by which we process your data

We comply with our obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align to the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members, where such photographs place the data subject as the focal point of the shot. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in 2nd Acomb (St. Stephen's) Scout Group
- to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- to administer membership records
- to fundraise and promote the interests of Scouting
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run or attended by 2nd Acomb (St. Stephen's) Scout Group
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of 2nd Acomb (St. Stephen's) Scout Group
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

Data retention periods

We will keep certain types of information for different periods of time in line with our Data Retention Policy.

As a Subject Rights Request (SRR) can be made by any type of individual represented here, data from an SRR will be retained for 7 years to allow for answers to queries and complaints raised in relation to the SRR.

Where possible, personal and sensitive (special category) data will be anonymised as soon as appropriate if they are to be retained for analysis or statistical purposes.

Young people

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins, whichever is shorter	Required for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	10 Years after the young person leaves	Required for enquiries on membership and to respond to enquiries from HQ or statutory agencies regarding incidents
Events	Personal and Sensitive data (special category)	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal and Sensitive data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident
Training records	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records
Attendance register	Personal data	18 months	Required to complete annual registration review Required to prove attendance for Gift Aid reclamation
HQ Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
HQ Youth award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership	To retain their award registrations for the duration of the eligibility period Historic record of award completions

		number, completion date	
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Adult volunteers

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until adult volunteer joins	Required for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	2 Years after the adult volunteer leaves	Required for enquiries on membership
Adult Information Form	Personal and Sensitive data (special category)	12 months or until approval checks and "Getting started" training is complete, whichever is shortest	Required to assist in the appointment process
Identity Checking Form	Personal data	Until ID data has been submitted to DBS/PVG and the vetting process is complete	Required to verify that the identity has been checked.
Events	Personal and Sensitive data (special category)	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal and Sensitive data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident
Training records	Personal data	2 Years after the adult volunteer leaves	Required for any re-joins to connect them back to their training records
Appointments Advisory Committee notes	Personal data	18 months	Required to review any training needs of adult volunteers
Adult award registrations	Personal and Sensitive data (special category)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period

	including citation)		
Adult award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ will retain the data permanently for basic data; name, county, award, membership number, completion date	To retain their award registrations for the duration of the eligibility period Historic record of award completions

Parents/guardians

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins	Required for placing individual's young person on a waiting list for a place
Joining	Personal data	2 Years after the young person leaves	Required for enquiries on membership
One-off events	Personal data	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy
Incident – No medical intervention	Personal data	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident

Donors

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	1 Year	To keep you informed of your donation
	Gift aid declaration	6 Years after donation	HMRC Tax Audit
	Direct debit mandate	6 Years after last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI

Notes

The retention of safeguarding data is handled by The Scout Association as part of the safeguarding policies and no data will be retained locally. This is in line with The Scout Association [Safeguarding Code of Conduct](#) (“Yellow Card”).

Any incidents that have required medical intervention will be reported to The Scout Association for alignment to an incident category and to manage the process.

The Scout Association’s Data Protection Policy can be found at <https://www.scouts.org.uk/about-us/policy/data-protection-policy/> and the Data Retention Policy can be found at <https://www.scouts.org.uk/about-us/policy/data-retention-policy/>.

Joint control of membership data

The Scout Association and 2nd Acomb (St. Stephen’s) Scout Group process the data of members, parents/guardians of youth members, and volunteers on our membership databases. Members’ parents/guardians and youth members data is only held by 2nd Acomb (St. Stephen’s) Scout Group. Volunteer data is processed between the local Scout Groups and The Scout Association. Information The Scout Association and 2nd Acomb (St. Stephen’s) Scout Group hold about volunteers may include the following:

- name and contact details
- length and periods of membership and volunteer service (and absence from membership and volunteer service)
- details of training received
- details of experience, qualifications, occupation, skills and awards received
- details of Scouting events and activities members have taken part in
- details of next of kin
- age/date of birth
- legal sex
- details of any health conditions
- details of disclosure checks
- any complaints we have received about the member
- details of any safeguarding concerns raised about or by the member
- details about role(s) in Scouting
- details about membership status
- diversity and inclusion data (including nationality, ethnicity, religion / belief, health information, gender, and sexual orientation)

Processing Activities

The following is a list of common data processing activities for members, parents/guardians of youth members and volunteers’ data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.

Processing Activity	Description	Processing entity
Scout Member capture	Initial data load of a new Scout Member onto the membership database.	2 nd Acomb (St. Stephen’s) Scout Group
Scout Member disclosure check	Disclosure checks for any adult Scout Members that require them.	2 nd Acomb (St. Stephen’s) Scout Group initiate

		The Scout Association complete the check
Scout Member operational administration	<p>This may include:</p> <ul style="list-style-type: none"> • Scout Member data updates • Maintaining training record • Events attended • Permits approved • Badges awarded 	2 nd Acomb (St. Stephen's) Scout Group and The Scout Association
Scout Member disciplinary	Scout Member disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy.	<p>2nd Acomb (St. Stephen's) Scout Group initiate</p> <p>The Scout Association involved if severity meets a policy threshold</p>
Scout Member leaving	The updating of an individual's membership status post leaving the association.	2 nd Acomb (St. Stephen's) Scout Group
Scout Member data reporting	Reporting on trends and monitoring data to be able to demonstrate The Scouts impact and to attract funding (this may include optional special category data of the Scout Members).	<p>The Scout Association</p> <p>2nd Acomb (St. Stephen's) Scout Group may access special category data for Census and local Scouting delivery</p>
Scout Member Training	The addition of mandatory training for Scout Members, where applicable.	The Scout Association
Scout Member roles definition	The definition of Scout Member roles on the membership databases,	The Scout Association

Sharing your information

Young people and other data subjects

We will normally only share personal information with adult volunteers holding an appointment in 2nd Acomb (St. Stephen's) Scout Group.

Adult volunteers

We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for 2nd Acomb (St. Stephen's) Scout Group as well as with The Scout Association Headquarters as independent data controllers.

All data subjects

We will however share your personal information with others outside of 2nd Acomb (St. Stephen's) Scout Group where we need meet a legal obligation. This may include The Scout Association and its insurance

subsidiary (Unity Insurance Services), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.

We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

We will never sell your personal information to any third party.

Sometimes we may nominate a member for national awards (such as Scouting awards or Duke of Edinburgh awards), such nominations may require us to provide contact details and award nomination details, such as citations to that organisation. We may also share data on award nominees for National Honours Awards, including the same data as above.

Where personal data is shared with third parties, we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and DPA 2018.

How we store your personal data

We store personal information in the following ways:

The Scout Association Online Membership System: used for the collection and storage of adult volunteer personal data.

Online Scout Manager: the online membership system of Online Youth Manager; this system is used for the collection and storage of youth member personal data.

Microsoft M365: the Group's provider for email, messaging and document storage.

Other digital systems: As listed in the IT Management Policy.

Printed records and data held while attending events: paper is sometimes used to capture and retain some data for example:

- Gift Aid administration
- Event registration
- Health and contact records forms (for events)
- Events coordination with event organisers

Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event.

Third-party data processors

Additionally, the Group employs the services of the following third-party data processors:

- **GoCardless** for processing direct debit payments for subscriptions and events.
- **Barclays Bank** for processing receipt of subscriptions or fees and payment of out-of-pocket expenses to leaders/ members.
- **Lloyds Bank** for processing and receiving payments for Redmire Station House and Group fundraising.
- **HMRC** for processing Gift Aid claims.
- **GoDaddy** hosts the website and domain registration; limited personal data is shared to enable the creation of user accounts and register domains. Contact forms may also contain limited personal data and these are held securely for transfer to other systems.
- **Amazon Web Services** hosts the website for Redmire Station House; very limited personal data is shared to enable the creation of administrative accounts.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, then we will provide you with a new information or an updated Policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How we provide this Data Protection Policy

The latest version of the policy is provided on the Policies section of the Group website, www.2ndacombscoutgroup.com. A link to this policy is provided to those whose data is being processed by us. A printed version is also available on request.

Your rights

As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk).

Unless subject to an exemption under the GDPR and DPA 2018, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by us.
- The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association's online membership system.
- The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held for legal reasons.
- The right to restrict processing – if you think that we are not processing your data in line with this Data Protection Policy then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask us, we will have to share your data with you in a way that can be read digitally – such as a PDF. This makes it easier to share information with others.
- The right to object – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input; it's highly unlikely that this will be used by us.

Website cookies

Cookies are in use on our website:

- to support site functionality, set by the WordPress site management software and its plugins
- to prevent abuse, set by Cloudflare (anonymous - details at <https://developers.cloudflare.com/fundamentals/reference/policies-compliances/cloudflare-cookies/>)
- for statistical measuring by our service provider GoDaddy (policy and settings at <https://www.godaddy.com/en-uk/legal/agreements/privacy-policy>)

Photography and social media/messaging apps

Promoting Scouting is important to the Group, and it is in the interest of all members to advertise the Movement through the use of appropriate positive images.

Social media is used as a means of promoting our brand and our activities. Leaders have undertaken specific training for handling these tools and guidance is available to them from The Scout Association. Our Public Facebook Page and Instagram accounts allow us to quickly share news and photos/videos that we think are appropriate to a wider audience. As these are used as promotional tools neither is restricted or "closed" in any way.

At events and weekly meetings, it is common for photographs and videos to be taken on leaders' personal devices and published on our social media feeds. While a selection of these photos may be posted to our social media channels, the majority will be kept indefinitely as a historical record of the Group's activities. We know from feedback that parents and carers find these photographs interesting and reassuring. Images are stored in accordance with the Group's IT Usage Policy and IT Management Policy.

The Group also has a closed WhatsApp community which all leaders, members of the Active Support Unit and parents, guardians or carers of current members can access. This closed community enables communication between all approved WhatsApp community members and is used to share events, photos, videos, questions and answers and information that is deemed useful and positive for our members. The moderators of the WhatsApp community approve the membership, ensure the content is pertinent to Scouting and is appropriate for the consumption of all, and reviews membership quarterly.

We will always endeavour to:

- Never publish personal details with any photo/image/video that would make the subject of the photograph identifiable
- Consider the content of all photo/image/video for good taste before publication
- Only publish photos/images relating to Scouting
- Remove any photo/image/video that breaches these guidelines as quickly as possible after it is brought to our attention; please inform administrators of any inappropriate content

While we will endeavour to keep to the above guidelines, we cannot control the legal right of third-party photographers to take pictures taken in a public place and publish them to websites and other publications that are outside of our control.

Parents can record their consent for the Group's use of photographs by accessing the parent portal. We understand that some people do not want photographs of their child published on social media. If that is the case, then you can refuse consent for your child to be photographed, and this will not affect their membership of the Group. However, for the reasons given above, we cannot ensure that they will not appear in the background of either our photos or other people's photos which may then get posted on the internet, although we will use reasonable efforts to ensure that this does not happen.

Who to contact

If you have any queries relating to this Data Protection Policy or our use of your personal data, or to exercise your rights, please contact our Data Controller at dataprotection@2ndacombscoutgroup.co.uk.